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OPEN MEETING AGENDA ITEM



Rev. Jarrett B. Maupin, II
President

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Arizona Corporation Commission

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Arizona Corporation Commission

Chairman Pierce
Commissioner Kennedy
Commissioner Stump
Commissioner Newman
Commissioner Burns

Re: APS Renewable Energy Implementation Plan; Docket No. E-01345A-10-0262

E01345A-10-0166

Dear Chairman Pierce and Commissioners;

As you may recall I appeared before you to comment on behalf of minority, working-class, and low-income families in favor of your unanimous decision in the SolarCity Case whereby you allowed third-party solar providers to own solar properties on the rooftops of schools, non-profits, government, and church facilities. I testified at the time that your decision would be the key to helping solar reach the underserved, through lower-income schools and churches in our community. It is that decision that has opened the floodgates to allow schools of all income classes and churches from all reaches of the state to compete with others on a level playing field to use solar energy to be good citizens, save money, and create jobs.

Perhaps the most important thing about the financing mechanism known as the solar service agreement that you approved in the SolarCity Case is that it allows all these entities to get solar *without spending a dime up front*. This is why the playing field is now level for schools and churches both rich and poor. When the price is zero every man can afford solar.

I was disappointed to learn that shortly after the ACC empowered underprivileged schools and churches from around the state to implement solar it almost immediately made a decision that was against the interest of those same needy institutions. The ACC's decision to allow APS to own up to 25% of the solar properties on underprivileged schools and non-profits while also allowing APS to sell those needy groups solar energy at prices in excess of market rates for solar energy is appalling. As a result of that decision we can be assured that many underprivileged schools, struggling churches, and urban non-profits are going to be confused and will end up paying APS more for solar than they would pay a company like SolarCity.

As a result of your leadership in the SolarCity Case poor schools, urban non-profits, and churches with financially troubled congregants no longer need a monopoly utility to sell them power at inflated rates and they can look to third party providers to help them be responsible citizens and save money. Many of these institutions have also partnered with third party companies to create new jobs, job training, and technology access for the community; something never offered by APS. These new opportunities would be destroyed if the monopoly is permitted to take advantage of the urban public solar industry. Remember, it costs these schools, churches, and service organizations nothing to get solar through a SSA and they begin saving money immediately. There is no need for APS to get into this business and I fear that if APS is in the market selling solar at inflated prices then many public and non-profit institutions who do not have the resources of others are precisely the ones who will fall into this trap. The poorer schools, churches, and non-profits are the ones who will unwittingly end up paying APS more for solar than they otherwise would pay a third party provider simply because they will not realize they have options.

I was pleased to hear you are reconsidering this decision at an upcoming hearing. We should not create situations that intentionally or unintentionally put poor families and the schools, churches, and non-profit groups that serve them at an even greater disadvantage. I can think of no reason why it would be right for APS to sell a poorer community's schools and churches solar energy at an inflated rate when that same community could go to a third party and get a better deal (again, with no upfront cost). I encourage you to build upon the leadership and the good decisions you made in the SolarCity Case and to protect the public's right to get solar at competitive prices. Please do not set up poorer neighborhoods and the struggling schools, religious bodies, and non-profit institutions that serve them to be preyed upon by a utility looking to make a quick buck and please reverse your decision and do not allow APS to own solar facilities serving poorer communities.

In Progress,

Rev.

Rev. Jarrett B. Maupin, II, President
Inner-City Democracy Empowerment Agency